

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

<b>In re:</b>	)	
<b>Laura Devore,</b>	)	<b>Case No: 22-49111 MAR</b>
	)	<b>Chapter 13</b>
<b>Debtor.</b>	)	<b>Judge Mark A. Randon</b>
	)	

**OBJECTION OF WINTRUST MORTGAGE TO DEBTOR'S  
PROPOSED CHAPTER 13 PLAN**

Wintrust Mortgage, a Division of Barrington Bank & Trust Co., N.A., by its undersigned attorney, hereby files this objection to the proposed Chapter 13 Plan filed by Laura Devore (the “Debtor”) and in support thereof respectfully states as follows:

1. On November 18, 2022, Debtor filed a Voluntary Petition under Chapter 13.
2. Wintrust Mortgage, a Division of Barrington Bank & Trust Co., N.A., (“Wintrust Mortgage”) is a mortgage creditor of the Debtor. Wintrust Mortgage has a perfected secured interest in the property located at 8735 Mercedes St. Dearborn Heights, Michigan 48127.
3. On December 1, 2022, the Debtor filed her Chapter 13 Plan (the “Plan”) in which the Debtor proposes to pay under Class 4.2 a pre-petition arrearage to Wintrust Mortgage in the amount of \$4,500.00.
4. On January 27, 2023, Wintrust Mortgage timely filed a Proof of Claim [17] for a claim amount of \$90,767.21. The pre-petition arrearage on Wintrust Mortgage’s Proof of Claim is \$7,350.78.
5. The pre-petition arrearages are understated in the Plan.
6. Wintrust Mortgage objects to the Plan, and to confirmation of the Plan, to the extent that the pre-petition arrearage owed to Wintrust Mortgage is not accurately treated in the Plan.

Dated: February 3, 2023

Respectfully Submitted,

/s/ Morgan I. Marcus  
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